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IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH

THE SCO GROUP, INC.,

Plaintiff,

V.

NOVELL, INC.,

Defendant.

PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS AND FIRST SET OF INTERROGATORIES

Case No. 2:04CV00139 Honorable Dale A. Kimball

UNIX License Agreements and Other Agreements

- 23. All documents concerning SCO's rights or claims under any UNIX license agreement, including but not limited to SCO's alleged right to terminate its UNIX license agreements with IBM, Sequent, or any other licensee, and SCO's alleged right to revoke any licensee's rights under its UNIX license agreements.
- 24. All documents concerning SCO's alleged termination of any UNIX license agreement.
- 25. All documents concerning SCO's alleged revocation of any licensee's rights under its UNIX license agreements.
- 26. All documents concerning Novell's purported rights under Section 4.16 of the APA, including but not limited to Novell's purported "prior approval" and "veto" rights and right to waive, or to direct SCO to waive, any of SCO's rights or claims under any UNIX license agreement.
- 27. All documents concerning SCO's agreements with Sun and Microsoft referenced in Paragraph 50 of Novell's Counterclaims and Paragraph 50 of SCO's Answer to Novell's Counterclaims.
- 28. All documents concerning the SCOsource program, including but not limited to documents concerning SCO's intellectual property licenses with Linux end-users.
- 29. All documents (not included in the document requests above) concerning Novell's rights and obligations under Section 4.16 of the APA.
- 30. All documents (not included in the document request above) concerning SCO's rights and obligations under Section 4.16 of the APA.

auditing, monitoring, reviewing, evaluating, recording, communicating, or reporting on

SCO's compliance or lack thereof with those provisions.

DATED this 11th day of January, 2006.

HATCH, JAMES & DODGE, P.C. Brent O. Hatch Mark F. James

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Robert Silver Stuart H. Singer Stephen N. Zack

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